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9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12 **WESTERN DIVISION**

13 NATIONAL CREDIT UNION
ADMINISTRATION BOARD, as
14 Liquidating Agent of Western Corporate
Federal Credit Union,

15 Plaintiff,

16 vs.

17 RBS SECURITIES INC., *et al.*,

18 Defendants.
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Case No. CV 11-05887 GW (JEMx)

**JOINT STIPULATION TO
EXTEND DEADLINES FOR
SUMMARY JUDGMENT
BRIEFING**

Judge: George H. Wu
Courtroom: 10

Complaint Filed:
July 18, 2011

First Amended Complaint Filed:
August 19, 2013

Second Amended Complaint Filed:
November 14, 2014

1 This Stipulation is entered into by and between counsel for Defendants RBS
2 Securities Inc. and RBS Acceptance Inc. (collectively “RBS”), Defendant Nomura
3 Asset Acceptance Corporation (“Nomura”), and Plaintiff National Credit Union
4 Administration Board as Liquidating Agent for Western Corporate Federal Credit
5 Union (“Plaintiff” and, together with RBS and Nomura, the “Parties” to the
6 Stipulation).

7 WHEREAS, under the Master Discovery Protocol (ECF No. 317), summary
8 judgment motions are to be filed by February 5, 2016 and fully submitted by March
9 25, 2016;

10 WHEREAS, in *National Credit Union Administration Board v. RBS Securities*
11 *Inc. et al.*, 11-cv-2340 (D. Kan.) (the “Kansas Action”), Judge Lungstrum entered an
12 order on October 20, 2015 extending the deadline to file dispositive motions to March
13 1, 2016 (ECF No. 684);

14 WHEREAS, trial in the Kansas Action has been set for January 23, 2017, but
15 no trial date has been set in this action;

16 WHEREAS, due to the complex nature of the issues that are expected to be
17 briefed in summary judgment motions, the Parties jointly request an extension of time
18 to file summary judgment motions, and further jointly request that they be permitted
19 45 days to submit opposition briefing and an additional 30 days to submit reply
20 briefing;

21 WHEREAS, the Parties have agreed to a proposed revised schedule for
22 summary judgment motions, subject to the Court’s approval, that modifies the existing
23 schedule in the Master Discovery Protocol (ECF No. 317);

24 WHEREAS, the Parties’ proposed schedule will not affect any other deadlines
25 in this action;

26 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that,
27 subject to the approval of the Court, the schedule for summary judgment motions shall
28 be as follows:

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3 1. Any summary judgment motions are to be filed by **August 5, 2016**.

4 Responses to summary judgment motions are to be filed by **September 19,**
5 **2016**, and replies in support of any such motions are to be filed by **October**
6 **19, 2016**.
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8 DATED: December 30, 2015

Respectfully submitted,

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10
11 **NATIONAL CREDIT UNION
ADMINISTRATION BOARD**

12 By: /s/ Michael E. Klenov
13 One of Their Attorneys

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26 ACCEPTANCE INC., AND
FINANCIAL ASSET SECURITIES
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**NOMURA ASSET ACCEPTANCE
CORPORATION**

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28 One of Their Attorneys

By: /s/ Barbara S. Steiner
One of Their Attorneys

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